

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

CHMURA ECONOMICS & ANALYTICS, LLC,)	Case No. 3:19-cv-813
)	Judge Robert E. Payne
)	
Plaintiff,)	
)	
v.)	
)	
RICHARD LOMBARDO,)	
)	
Defendant.)	

**DEFENDANT RICHARD A. LOMBARDO’S MOTION TO FILE EXHIBITS UNDER
SEAL**

Defendant, Richard Lombardo (“Lombardo”), by counsel, and pursuant to Federal rUle of Civil Procedure 26(c) and Local Civil Rule 5, respectfully moves this Court for an Order granting this Motion to File Exhibits Under Seal. For the reasons discussed in the accompanying Memorandum of Law, Lombardo respectfully requests the Court’s permission to file the following documents under seal:

- Exhibits 1 and 2 attached to the Declaration of Richard A. Lombardo in Support of the Opposition to Chmura’s Motion for Summary Judgment (the “Opposition”), which is attached Exhibit B attached to the Opposition;
- Exhibit X to the Deposition of Christine Chmura; and
- Exhibit AA to the Volume II of the Deposition of Leslie Peterson.

A proposed Order granting this Motion is attached.

Respectfully submitted,

/s/ Thomas J. Powell

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Motion has been served on this 29th day of May, 2020, via the Court's electronic filing system upon the following:

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